

UNITED STATES DISTRICT COURT  
for the  
Eastern District of California

**FILED**  
May 30, 2023  
CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

**SEALED**

UNITED STATES OF AMERICA  
v.  
MARCUS MILLER,  
REGINALD JONES,  
FELICIA SHAW,  
JIMMY VAN II, AND  
JAZZMINE CAMPBELL

Case No. 2:23-mj-0085 JDP

*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2022 in the county of Sacramento in the  
Eastern District of California, the defendant(s) violated:

*Code Section*

*Offense Description*

21 U.S.C. §§ 846 and 841(a)(1)

Conspiracy to distribute and possess with intent to distribute controlled substances

This criminal complaint is based on these facts:

(see attachment)

☒ Continued on the attached sheet.

/s/ Jason Bauwens

*Complainant's signature*

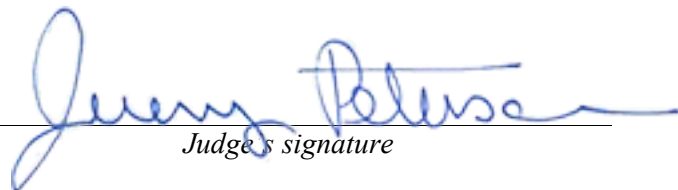
Jason Bauwens, U.S. Postal Inspector

*Printed name and title*

Sworn to before me and signed telephonically.

Date: May 30, 2023

City and state: Sacramento, CA

  
*Judge's signature*

Jeremy D. Peterson, U.S. Magistrate Judge

*Printed name and title*

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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

MARCUS MILLER,  
REGINALD JONES  
FELICIA SHAW,  
JIMMY VAN II, AND  
JAZZMINE CAMPBELL,

Defendants.

CASE NO.

AFFIDAVIT IN SUPPORT OF CRIMINAL  
COMPLAINT

**UNDER SEAL**

I, Jason Bauwens, being first duly sworn, hereby depose and state as follows:

**I. INTRODUCTION AND SUMMARY OF CHARGES**

1. This Affidavit is made to support a Criminal Complaint and Arrest Warrant charging Marcus MILLER, Reginald JONES, Felicia SHAW, Jimmy VAN II and Jazzmine CAMPBELL with knowingly and intentionally conspiring to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. §§ 846 and 841(a)(1), beginning on a date unknown but no later than in or about January 2022 and continuing to the present.

2. As discussed in further detail below, MILLER and JONES, both members of the Oak Park Bloods criminal street gang and the co-leaders of a Sacramento area drug trafficking organization (MILLER-JONES DTO), are distributing large quantities of counterfeit oxycodone pills containing

1 fentanyl in the greater Sacramento, California area and throughout various cities across the United States,  
2 primarily utilizing the U.S. Mail. MILLER and JONES have numerous co-conspirators in their supply  
3 and distribution network, including but not limited to, Felicia SHAW, Jimmy VAN II, and Jazzmine  
4 CAMPBELL.

5 3. Agents have seized over 250,000 fentanyl-laced pills from packages shipped by members  
6 of the MILLER-JONES DTO and identified over 100 packages of suspected narcotics mailed by the  
7 MILLER-JONES DTO since 2022. Based on the ongoing investigation, it is estimated the MILLER-  
8 JONES DTO has trafficked over one million counterfeit oxycodone pills containing fentanyl throughout  
9 Sacramento and to multiple States, including Alaska, Maryland, California, Michigan, South Dakota,  
10 Montana, Pennsylvania, North Carolina, Virginia, Louisiana, Mississippi, New York, and New Jersey.  
11 On several occasions, the drugs were packaged and shipped inside of children's toys.

12 4. Each member of the MILLER-JONES DTO plays a specific, critical role, and sometimes  
13 these roles are alternated among the conspirators. MILLER and JONES primarily coordinate with the  
14 MILLER-JONES DTO's source of supply for fentanyl-laced pills, travel on behalf of the MILLER-  
15 JONES DTO to pick up and send drugs or drug money, and distribute these pills in Sacramento and  
16 across the country. SHAW, VAN II, and CAMPBELL work together with MILLER and JONES to  
17 receive, package, and/or concurrently ship drugs for distribution across the country, as well as help sell  
18 and distribute these fentanyl-laced pills in Sacramento. SHAW, VAN II, and CAMPBELL have also  
19 traveled with MILLER and JONES to facilitate the distribution and collection of pills and drug money  
20 across the United States.

## 21 II. AGENT BACKGROUND

22 5. I am a Postal Inspector with the United States Postal Inspection Service (USPIS) currently  
23 assigned to the Sacramento, California field office. I investigate criminal violations of federal and state  
24 law, including illegal narcotics, firearms, and illicit proceeds being sent through the U.S. Mail; money  
25 laundering; robbery and burglary of postal employees and facilities; theft/possession of stolen U.S. Mail;  
26 mail and bank fraud; and identity theft crimes. I am a "federal law enforcement officer" within the  
27 meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure; that is, a federal law  
28 enforcement agent engaged in enforcing criminal laws and authorized to request a search warrant.

1           6.       I have been a federal law enforcement agent for over 20 years, and I have graduated from  
2 several federal training academies. In 1998, I graduated from the ten-week National Park Service Law  
3 Enforcement Academy in Sylva, North Carolina. In 2003, I graduated from the sixteen-week National  
4 Park Ranger Integrated Police Training Program at the Federal Law Enforcement Training Center in  
5 Glynco, Georgia. Most recently, I graduated from the twelve-week Criminal Investigator Training  
6 Program at the Federal Law Enforcement Training Center in Glynco, Georgia. Throughout my career, I  
7 have investigated over 1,000 cases involving criminal violations of federal, state, and tribal laws. I have  
8 conducted drug-related investigations for over 10 years and have instructed hundreds of hours of training  
9 related to drug trafficking. I have testified in various federal and state court proceedings. I have  
10 participated in multiple Title III wire intercepts regarding drug trafficking investigations and have  
11 worked with numerous confidential sources.

12           7.       During my training, experience, and interaction with other experienced Postal Inspectors,  
13 Task Force Officers, and other drug and firearm trafficking investigators, I have become familiar with the  
14 methods employed by drug and firearm traffickers to smuggle, safeguard, store, transport, and distribute  
15 drugs and firearms; to collect and conceal drug and firearm-related proceeds; and to communicate with  
16 other participants to accomplish such objectives. I have received specialized training and instruction in  
17 narcotics and firearm investigation matters including interdiction, detection, money laundering  
18 techniques and schemes, and drug and firearm identification. I have participated in and led numerous  
19 investigations targeting individuals and organizations trafficking marijuana, methamphetamine, heroin,  
20 cocaine, LSD, steroids, and many other controlled substances, along with narcotics proceeds, utilizing the  
21 U.S. Mail. I have participated in and led numerous investigations targeting individuals trafficking  
22 firearms via the U.S. Mail. I have investigated many drug traffickers and money launderers who use the  
23 dark web, encrypted message applications, cryptocurrencies, and various other concealing platforms in  
24 furtherance of their criminal enterprises. During the course of these investigations, I have become  
25 familiar with the manner in which drug and firearm traffickers conduct their illegal operations. I have  
26 written numerous search, seizure, and arrest warrants related to drug and firearms trafficking  
27 investigations, drug proceeds investigations, and parcel interdiction.

28           8.       The facts in this affidavit come from my personal observations, my training and

experience, and information and reports obtained from other agents and witnesses. Since this Affidavit is being submitted for the limited purpose of demonstrating probable cause for the issuance of a criminal complaint and accompanying arrest warrants, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that Marcus MILLER, Reginald JONES, Felicia SHAW, Jimmy VAN II and Jazzmine CAMPBELL have conspired to distribute and to possess with intent to distribute controlled substances, in violation of 21 U.S.C. §§ 846 and 841(a)(1).

### III. PROBABLE CAUSE

#### A. Overview of the Conspiracy

9. As described in further detail below, the MILLER-JONES DTO operates by acquiring large amounts of fentanyl pills and distributing these pills across the country by mailing them. MILLER and JONES have both traveled to Phoenix to acquire fentanyl pills from their source, who they refer to as “Junior” or “J.” From Phoenix, MILLER and JONES bring the pills back to Sacramento, frequently by shipping the fentanyl pills hidden in children’s toys.

10. MILLER and JONES often ship their fentanyl pills to the residence of Jimmy VAN II, which MILLER has referred to as a “trap” house—a house used to store drugs.

11. Once the pills arrive in Sacramento, the members of the MILLER-JONES DTO distribute them in the Sacramento area, and also ship them to customers around the country. Agents have seized pills from packages that MILLER, JONES, SHAW, and CAMPBELL have all shipped from post offices in the Sacramento area to locations around the country, including Alaska, South Dakota, and Maryland. Shipping records show that the MILLER-JONES DTO has shipped dozens of packages to other states as well.

12. MILLER and JONES receive payments for drugs through a variety of methods. Bank records and text messages indicate that they often use money transfer applications—such as CashApp, Zelle, and ApplePay—to send money. JONES has also received thousands of dollars in cashier’s checks mailed to him from locations where he and his co-conspirators have mailed drugs. In addition, flight records indicate that members of the MILLER-JONES DTO have flown from Sacramento to locations where the DTO has mailed drugs and back to Sacramento in less than 48 hours. Based on my training

1 and experience, I know that such quick turnaround trips are consistent with collecting money from drug  
2 sales and not personal vacations.

3 **B. MILLER and JONES fly to Phoenix to pick up pills from their supplier and ship the**  
4 **pills back to Sacramento**

5 13. Flight records, text messages, and postal records show that on several occasions, MILLER  
6 and JONES have flown from Sacramento to Phoenix, picked up pills from a supplier in Phoenix, and  
7 shipped the pills back to Sacramento for further distribution. As discussed below, MILLER and JONES  
8 have referred to this supplier as “Junior” or “J.”

9 1. In November 2022, MILLER mailed two packages containing more than twenty  
10 pounds of fentanyl pills, hidden inside children’s toys, from Phoenix to two  
11 addresses in Sacramento, including VAN II’s address.

12 14. On November 8, 2022, MILLER<sup>1</sup> mailed two packages from two different post offices in  
13 the Phoenix, Arizona area. Both packages contained fentanyl hidden inside of children’s toys.

14 15. The first parcel that MILLER mailed, Parcel 1, was addressed to “Ms. Cameroon  
15 Williams 5546 Rightwood Way Sacramento, CA 95823”, an address previously associated in CLEAR<sup>2</sup>  
16 with MILLER (and his wife Karmen Williams), and is the same address I previously flagged as getting  
17 suspicious parcels from Arizona.

18 a) Agents searched this parcel pursuant to a federal search warrant (2:22-SW-0842-  
19 CKD) and found approximately 12 pounds of counterfeit oxycodone pills which field tested  
20 positive for fentanyl.

21 b) Agents submitted the box and packaging contents of Parcel 1 to the USPIS  
22 Forensic Laboratory for fingerprint processing and analysis. An analyst found twenty-seven  
23 fingerprint matches belonging to MILLER on the inner contents of Parcel 1.

24 16. The second parcel searched (Parcel 2) was destined to the delivery name and address:  
25 “Ms. Devaughn Carter 5924 63rd Street Sacramento, CA 95824”, an address known to be associated with

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26 <sup>1</sup> I reviewed the Phoenix area Post Office surveillance videos present during the time both parcels  
27 were mailed, and based on a review and comparison of DMV, Social Media and Jail Booking images, the  
28 person that mailed these parcels was MILLER.

<sup>2</sup> Thomson Reuters CLEAR is an online public and proprietary records database regularly used by  
law enforcement and government agencies to verify names and addresses and has been determined to be  
reliable.



Jimmy VAN II based a search of CLEAR and California DMV Records. In conversations, discussed below, MILLER has referred to this house as a “trap,” which I understand to be slang for a “trap house,” meaning a house used to store drugs.

a) Agents searched this parcel pursuant to a federal search warrant (2:22-SW-0858-AC) and again found approximately 12 pounds of counterfeit oxycodone pills which field tested positive for fentanyl.

b) Agents submitted the box and packaging contents of Parcel 2 to the USPIS Forensic Laboratory for fingerprint processing and analysis. Forty-nine fingerprint matches belonging to MILLER were identified on the inner contents of Parcel 2.

17. For both Parcel 1 and Parcel 2, the pills agents found were packaged similarly: hidden inside children’s toys, as pictured below:

**Parcel 1 Surv Image and Seized Narcotics**



**Parcel 2 Surv Image and Seized Narcotics**



2. In December 2022, JONES took two trips to Phoenix to pick up pills and mailed them to Sacramento in three packages; two were sent to VAN II’s address.

18. In December 2022, JONES took two back-to-back trips in less than 48 hours from Sacramento to Phoenix to pick up pills and mail them back to Sacramento.

19. On Saturday, December 17, 2022, JONES and MILLER engaged in a text message

1 conversation<sup>3</sup> discussing JONES's upcoming trip to Arizona and his plans to meet with "Junior". JONES  
2 sent a message to MILLER indicating that "Junior" had texted him and "Junior" said he could "only do  
3 20." MILLER replied, "that's coo you can keep the whole 20 n i'll pay for the flight n rental n you pay  
4 to send em all..i'm not finna be inda red bout 10 iont really need em." JONES then asked for the address  
5 where MILLER wanted the suspected package to go. MILLER replied, "i send to trap".

6 a) I interpret this conversation to be MILLER and JONES discussing JONES's plans  
7 to pick up 20,000 counterfeit pills and discussing where JONES should send the pills.  
8 Specifically, when JONES said that "Junior" had texted him and said he could "only do 20," I  
9 believe, based on my participation in this case and later seizures, that JONES was telling  
10 MILLER that their supplier, "Junior" could only provide them with twenty thousand counterfeit  
11 pills. MILLER responded that JONES could keep the whole 20 and MILLER would pay for  
12 JONES's "flight n rental" if JONES would pay to ship the pills ("pay to send em all"). JONES  
13 asked MILLER where to send the package and MILLER responded that JONES should send the  
14 pills "to trap," which I understand to be slang for a "trap house," or a house used to store drugs.

15 b) This conversation is consistent with my belief that there is an ongoing drug  
16 trafficking partnership between MILLER and JONES, with "Junior" supplying the co-  
17 conspirators with drugs for further distribution, based upon the length of time during which their  
18 sales have been ongoing and the high frequency of sales involving a large amount of fentanyl.  
19 Given their coded communications about their source and arrangements for delivery and receipt  
20 of large amounts of fentanyl, I believe there is a high level of trust between MILLER and JONES  
21 because they are engaged in a high-risk drug trafficking partnership.

22 20. The next day, December 18, 2022, flight records show that JONES flew from Sacramento  
23 to Phoenix. The following day, December 19, 2023, JONES mailed a four-and-a-half-pound parcel from  
24 a Phoenix, Arizona area post office to "James Van 5924 63rd Street Sacramento, CA 95824." This  
25 address is the known residence of Jimmy VAN II and the same delivery address of other parcels that also

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26 <sup>3</sup> This conversation was obtained through a warrant for MILLER's iCloud accounts (2:23-sw-  
27 0100 AC). MILLER's iCloud accounts were identified in part due to the fact that the phone number 612-  
28 916-5976 was linked to the iCloud accounts and that MILLER is the listed subscriber for the same  
number. JONES's phone number was identified in part by AT&T records, which show the listed  
subscriber as Reginald J 857 Silicon Ct West Sacramento, Ca 95691.



contained fentanyl, as discussed in further detail below. Law enforcement did not search or seize this parcel, but instead conducted surveillance and observed the USPS delivery of the package containing suspected drugs. When the parcel was delivered two days later to this address in Sacramento, law enforcement saw a man accept the package that appeared to be VAN II, based on a review and comparison of DMV, Social Media and Jail Booking images.<sup>4</sup>

21. Flight records indicate that on Monday, December 19, JONES flew back from Phoenix to Sacramento.

22. The following day, Tuesday, December 20, flight records indicate that JONES again flew from Sacramento to Phoenix.

23. When JONES landed in Phoenix, he sent a text message to MILLER—again retrieved from MILLER’s iCloud—to tell MILLER he had just arrived in Phoenix, and that once again, he was going to meet up with MILLER’s “buddy” “J.” Below are the verbatim messages:

JONES: Landed foo

MILLER: yessir

JONES: Supposed to link wit buddy in a couple hours

MILLER: who j

JONES: Yup

24. Based on the context of these messages, and subsequent events discussed below, I interpret the above messages to indicate that on Tuesday, December 20, JONES flew to Phoenix again and was going to meet with the MILLER-JONES DTO’s source of supply (“J”) to buy narcotics.

25. On Wednesday, December 21, JONES<sup>5</sup> mailed two packages containing drugs from two different post offices in the greater Phoenix, Arizona, area to addresses in Sacramento. Agents seized the packages and searched them pursuant to a federal search warrant (2:22-SW-0980-JDP). I noted that

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<sup>4</sup> I conducted a review of the Phoenix area Post Office surveillance video present during the time this parcel was mailed, and based on a review and comparison of DMV, Social Media and Jail Booking images, determined the person that mailed this parcel, delivered to VAN II, was JONES.

<sup>5</sup> I conducted a review of the two Phoenix area Post Office surveillance videos present during the time PARCEL 4 and PARCEL 5 were mailed, and based on a review and comparison of DMV, Social Media and Jail Booking images, the person that mailed PARCEL 4 and PARCEL 5 containing the fentanyl was JONES.

JONES traveling to two different post offices within the same city was consistent with my training and experience that drug traffickers often will travel to multiple locations to send drugs in order to avoid law enforcement discovering all of their illicit packages at one particular location and increase their chances of successfully moving controlled substances through the mail.

26. One of the parcels that JONES mailed (Parcel 4) was destined to the delivery name and address: “R. Higgins 857 Silicon Ct West Sacramento, CA 95691,” an address known to be associated with both Reginald JONES and Felicia SHAW based on a search of CLEAR, surveillance, cell phone location data and other investigation.

a) I executed the search warrant on Parcel 4 and seized approximately 9.9 pounds of counterfeit oxycodone pills which field tested positive for fentanyl.

27. The other parcel that JONES mailed (Parcel 5) was destined to the delivery name and address: “James Van 5924 63rd St Sacramento, CA 95824,” which is the same location JONES sent the parcel from Phoenix two days earlier, the known address of VAN II, and the same address MILLER referred to as the “trap” in messages discussed above.

a) I executed the search warrant on Parcel 5 and seized approximately 12.2 pounds of counterfeit oxycodone pills which field tested positive for fentanyl. As was the case with the Parcels 1, and 2—mailed by MILLER—the counterfeit fentanyl pills seized from Parcels 4 and 5 were concealed within children’s toys as pictured below:

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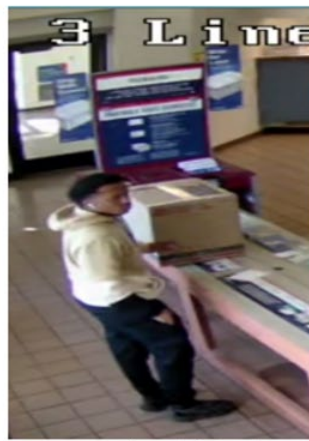
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**Parcel 4 Surv Image and Seized Narcotics**



**Parcel 5 Surv Image and Seized Narcotics**



28. I also reviewed USPS business records, which showed multiple online, customer-initiated tracking inquiries on Parcel 4. Law enforcement received AT&T account records for two of the customer inquiries on Parcel 4 for comparison, which revealed the online tracking inquiries for Parcel 4 were from the AT&T customer internet account in the name of SHAW, with a service address of “857 Silicon Court, West Sacramento, CA 95691.”

29. After JONES shipped the packages on December 21, messages between JONES and MILLER—seized from MILLER’s iCloud account—show that JONES asked for MILLER to reimburse him for his expenses from his trip to Phoenix:

JONES: After flight, rental, supplies, and mail came out to 1255

MILLER: aite

JONES: First one landed foo

MILLER: aite bet

MILLER: where u want it to go

JONES: Zelle it to easymoneylayup@gmail.com

1           30. I interpret the above messages to indicate that, after traveling to Phoenix and mailing  
2 parcels, JONES provided the total costs of the trip to MILLER so that MILLER would reimburse JONES  
3 for the cost of the trip through a payment via Zelle, a money-sending service. Based on my training,  
4 experience, and participation in this investigation, I also believe that when JONES said “first one  
5 landed,” he was using slang to tell MILLER that the “first” package he sent had arrived at its destination  
6 (“landed”), consistent with JONES having shipped several packages and updating MILLER on the status  
7 of one package having arrived (or “landed”). The significance of this evidence is that it demonstrates that  
8 MILLER and JONES regularly advise each other on the conduct of the business and thus trust each other  
9 in a criminal partnership focused on distributing drugs.

10           31. I reviewed bank records for MILLER’s Bank of America account ending in -9613, which  
11 show that on December 21, the same day JONES sent a message to MILLER asking him to send “1255”  
12 through Zelle, MILLER in fact sent \$1,255 via Zelle to “Reginald,” JONES’s first name.

13                   3. In January 2023, JONES shipped more than 9 pounds of fentanyl pills from  
14 Phoenix to SHAW’s address in Sacramento.

15           32. On January 24, 2023, GPS location data for JONES’ cell phone<sup>6</sup> showed that the phone  
16 was at the Phoenix International Airport. Agents drove to the Sacramento International Airport,  
17 established surveillance, and saw JONES exit the security checkpoint area after the arrival of his  
18 American Airlines flight. Agents saw JONES collect a roller suitcase at baggage claim before a female  
19 picked him up curbside.

20           33. I reviewed USPS records from Phoenix and saw that on the morning of January 24, 2023,  
21 JONES<sup>7</sup> mailed a Priority Mail parcel from a Phoenix area post office to “Felicia Shaw, 2966 Flora  
22 Springs Way, Sacramento, CA 95834,” an address associated with SHAW in CLEAR. Agents seized  
23 Parcel 7, searched it pursuant to a federal search warrant (2:23-SW-0088-KJN), and found approximately  
24

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25           <sup>6</sup> Between January 2023 to present, and at differing times for each subject, law enforcement has  
26 obtained federal search warrants and court orders to obtain GPS location information and pen  
27 register/trap and trace information for the various cell phones utilized by the MILLER-JONES DTO,  
28 including those used by MILLER, JONES, SHAW, VAN and CAMPBELL.

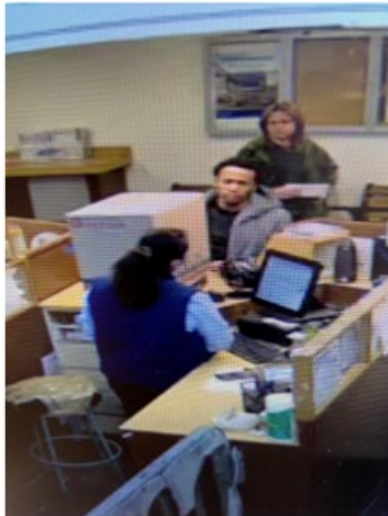
<sup>7</sup> I conducted a review of the Phoenix Post Office surveillance video present during the time  
PARCEL 7 was mailed, and based on a review and comparison of DMV, Social Media and Jail Booking  
images, the person that mailed PARCEL 7 containing the fentanyl was JONES.



9.6 pounds of counterfeit oxycodone pills which field tested positive for fentanyl.

34. As was the case with other parcels shipped by MILLER and JONES, the counterfeit fentanyl pills seized from Parcel 7 were concealed within children's toys:

***Parcel 7 Surv Image and Seized Narcotics***



35. USPS business records indicated there were multiple online, customer-initiated tracking inquiries on Parcel 7. Law enforcement received AT&T account records for two of the customer inquiries on Parcel 7 for comparison, which revealed the online tracking inquiries for Parcel 7 were from the AT&T customer internet account in the name of SHAW, with a service address of "857 Silicon Court, West Sacramento, CA 95691" – just like Parcel 4.

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- 1                   4.     Flight records indicate that MILLER and JONES have both taken several short  
2                   trips from Sacramento to Phoenix, and eighteen packages have been mailed from  
3                   Phoenix to addresses in the Sacramento area with known connections to the  
4                   MILLER-JONES DTO.

5                   36.     Flight records show that JONES and MILLER have both taken several trips from  
6                   Sacramento to Phoenix and back to Sacramento in less than 48 hours. Since January 2022, flight records  
7                   indicate MILLER has taken at least ten trips to Phoenix and returned to Sacramento in less than 48 hours.  
8                   In the same timeframe, JONES has taken at least eight trips to Phoenix and returned to Sacramento in  
9                   less than 48 hours. I know from my training and experience that such flight patterns—with short stops in  
10                  a destination and a quick returns—are inconsistent with travel for a personal vacation and are more  
11                  consistent with travel for the purpose of drug trafficking.

12                  37.     In addition, since January 2022, postal records show that at least eighteen large  
13                  packages—ranging from four to thirty pounds in size—have been shipped from Phoenix to Sacramento  
14                  via Priority and Express mail to addresses identified in this investigation as being associated with the  
15                  MILLER-JONES DTO. These packages have been shipped to the following addresses:

16                  a)     Two boxes were shipped from Phoenix to 2966 Flora Springs Way, Sacramento,  
17                  CA. This is the address of SHAW's family and where SHAW has her car registered. One of  
18                  these boxes was seized and fentanyl pills were found, as discussed above.

19                  b)     Seven boxes were shipped from Phoenix to 857 Silicon Court, West Sacramento,  
20                  CA. This is SHAW's current address and an address that JONES has been to several times  
21                  according to cell phone location and vehicle tracker data. One of these seven boxes was seized  
22                  and fentanyl pills were found, as discussed above.

23                  c)     Five boxes were shipped from Phoenix to 5924 63rd Street, Sacramento, CA. This  
24                  is VAN II's address and the location referred to as a "trap" house. Two of these five boxes were  
25                  seized and fentanyl pills were found in each, as discussed above.

26                  d)     Four boxes were shipped from Phoenix to 5546 Rightwood Way, Sacramento, CA.  
27                  This is the address where MILLER's car is registered, and CLEAR searches indicate that this  
28                  address is connected to MILLER's wife, as well. One of the four boxes was seized and fentanyl  
                  pills were found, as discussed above.



1                   5.     In May 2023, MILLER and VAN II flew from Sacramento to Phoenix and drove  
2                   through the night back to Sacramento.

3                   38.     On Wednesday, May 17, 2023, GPS location data on MILLER's and VAN II's cell  
4 phones showed that the two both flew from Sacramento to Phoenix, Arizona. Over the next two days,  
5 their cell phone location data showed they were staying at the same hotel and travelling together while in  
6 Phoenix.

7                   39.     In the early morning of Friday, May 19, 2023, VAN II travelled to the Phoenix airport and  
8 flew back to Sacramento, while MILLER remained in Phoenix. VAN II travelled around Sacramento  
9 throughout the day.

10                  40.     Approximately eight hours after he returned to Sacramento, VAN II again boarded a flight  
11 back to Phoenix, Arizona. VAN II landed in Phoenix at approximately 10:00 p.m. Less than three hours  
12 later—shortly after midnight—cell phone location data revealed that VAN II and MILLER were together  
13 again and began driving from Phoenix back to Sacramento. MILLER and VAN II drove for  
14 approximately 14 hours, before arriving back in Sacramento at 3:00 p.m. on Saturday, May 20, 2023.

15                  41.     After stops at MILLER's residence and VAN II's residence, they travelled to the  
16 Sacramento airport, presumably to return the rental car they drove from Phoenix to Sacramento. After  
17 returning the rental car, MILLER retrieved his known vehicle, and based on the review of cell phone and  
18 GPS tracker data, MILLER travelled to the CubeSmart storage unit in West Sacramento, California,  
19 previously identified by law enforcement in this investigation, which is known to be rented by JONES,  
20 and frequented by JONES, MILLER and SHAW.

21                  42.     I believe this travel pattern is consistent with drug trafficking activity. As discussed  
22 above, I know that drug traffickers will often fly to destinations, pick up narcotics, then return home in  
23 rental cars. In addition, I know that drug traffickers will often travel long distances to pick up narcotics,  
24 stay only a short time, and return to their hometown. I therefore believe VAN II's travel pattern—flying  
25 from Phoenix to Sacramento and back in a day, then driving through the night back to Sacramento only a  
26 few hours later—is consistent with him and MILLER driving back to Sacramento with narcotics that they  
27 picked up in Phoenix.

28     ///

1           **C. In Sacramento, MILLER and JONES often use VAN II's house as a "trap house" to**  
2           **receive drugs.**

3           43. VAN II's house, 5924 63rd Street Sacramento, CA 95824, is frequently used to receive  
4 parcels—often containing drugs—on behalf of the MILLER-JONES DTO.

5           44. Based on text messages from MILLER to VAN II, it appears that MILLER rented the  
6 63rd Street residence for VAN II. Specifically, on September 14, 2022, MILLER sent a text message to  
7 VAN II<sup>8</sup>—obtained through MILLER's iCloud account—in which MILLER provided the address, "5924  
8 63rd St Sacramento CA 95824 United States" and said, "that's your new address." I interpret this  
9 message to mean that MILLER secured a residence for VAN II to reside in that would later be used to  
10 receive shipments of narcotics. This is consistent with the fact that SMUD service began in VAN II's  
11 name at this address just 13 days after this message from MILLER, and the first package sent to this  
12 address by the MILLER-JONES DTO was in November 2022.<sup>9</sup>

13           **D. From Sacramento, several members of the MILLER-JONES DTO ship packages of**  
14           **counterfeit fentanyl pills to downstream distributors across the country.**

15           45. On several occasions, investigators have seized pills shipped from members of the  
16 MILLER-JONES DTO to recipients in other states. MILLER, JONES, SHAW, and CAMPBELL have  
17 all shipped packages that were seized and found to contain pills. In addition, text messages between  
18 MILLER and VAN II indicate that VAN II, too, has shipped packages containing pills on behalf of  
19 MILLER and the MILLER-JONES DTO. These shipments are discussed in further detail below.

20           1. **In July 2022, text messages indicate that MILLER arranged to sell narcotics to a**  
21           **buyer in Anchorage, Alaska, then VAN II mailed a parcel to the buyer.**

22           46. In late June and early July 2022, MILLER had a text message conversation with an  
23 individual listed in his iCloud account as "Matt Anc," and the two discussed MILLER selling and  
24

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25           <sup>8</sup> Law enforcement identified this phone number belonging to Jimmy VAN through a search of  
26 CLEAR and through MILLER's iCloud accounts, both of which list the phone number to VAN by his  
full name and address.

27           <sup>9</sup> Based on USPS business records, I am aware of five parcels believed to be associated with the  
28 MILLER-JONES DTO shipped from the Phoenix, Arizona area to the delivery address "5924 63rd St  
Sacramento CA 95824" since November 2022. As discussed above, two parcels mailed from Phoenix to  
this address were seized and contained large quantities of counterfeit pills containing fentanyl.

1 shipping an unspecified item to “Matt Anc” in Anchorage, Alaska:

2 a) On June 22, “Matt Anc” provided his address as 500 West 19th Ave, Anchorage,  
3 AK 99503. Two days later, MILLER asked where his money was, and Matt Anc said he sent he  
4 funds. MILLER confirmed he received them.

5 b) Later, on July 6, 2022, Matt Anc sent a message to MILLER saying he had the  
6 “full 5000” and once the money was in “her” account, he would send it all.

7 47. That same day, July 6, MILLER sent a message to VAN II asking, “where I say it’s at”  
8 and VAN II replied, “I need to go look again because I didn’t overnight it.” I interpret this conversation  
9 to mean that MILLER and VAN II were discussing VAN II shipping a package (“overnight[ing] it”) on  
10 behalf of the MILLER-JONES DTO. This is significant because it demonstrates that VAN II is familiar  
11 with the drug operation and communicates directly with MILLER to keep him apprised about the status  
12 of pending drug shipments made on behalf of the MILLER-JONES DTO.

13 48. A month later, another parcel with a pound of fentanyl pills was sent from Sacramento to  
14 the address provided by “Matt Anc.” Specifically, on August 22, 2022, an Express Mail parcel was  
15 mailed from a Post Office in Sacramento, California, to Anchorage, Alaska. The recipient was listed as  
16 “MR. MATT WILLIAMS 500 WEST 19TH AVE ANCHORAGE, AK 99503 907-271-2582,” the same  
17 address provided by “Matt Anc” to MILLER a month earlier. Postal Inspectors in Alaska intercepted the  
18 parcel (Alaska Parcel), and pursuant to a federal search warrant issued in the District of Alaska for  
19 Alaska Parcel (3:22-MJ-00395-KFR), searched it and seized approximately one pound of counterfeit  
20 oxycodone pills. The return address for the parcel was listed as MR. CARL THOMAS 5681 ODEA DR  
21 #1 SACRAMENTO, CA 95824, an address that CLEAR searches indicate is MILLER’s mother’s  
22 residence.

23 2. In October 2022, MILLER mailed a package containing approximately 2.4 pounds  
24 of fentanyl pills—hidden inside children’s toys—from Sacramento to North  
Carolina.

25 49. On October 26, 2022, MILLER<sup>10</sup> shipped a parcel containing fentanyl pills from a post  
26 office in Sacramento to an address in Henderson, North Carolina. Agents searched this parcel (Parcel 3)

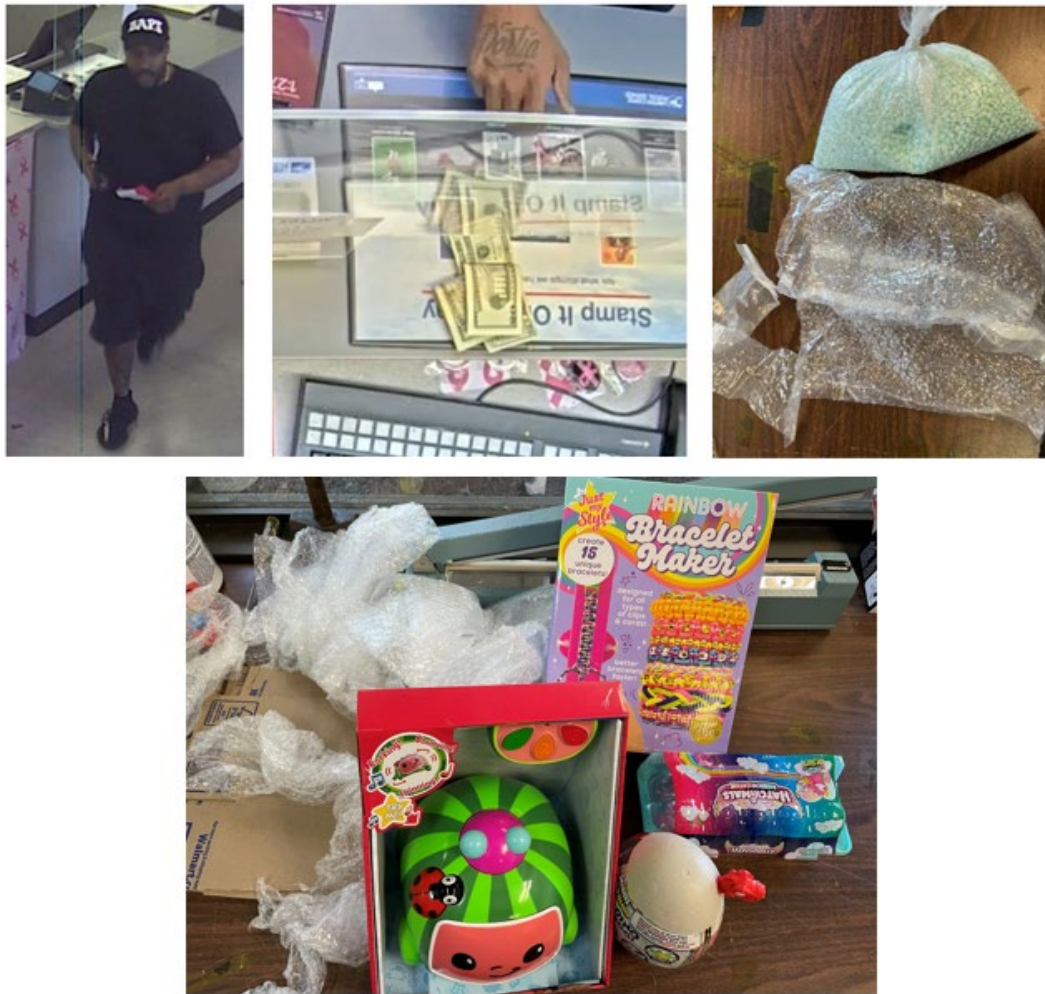
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27 <sup>10</sup> I reviewed the Sacramento area Post Office surveillance video present during the time  
28 PARCEL 3 was mailed, and again, based on a review and comparison of DMV, Social Media and Jail  
Booking images, the person that mailed PARCEL 3 containing the fentanyl was MILLER.

pursuant to a federal search warrant (2:22-SW-0866-AC) and found approximately 2.4 pounds of counterfeit oxycodone pills which field tested positive for fentanyl.

50. As with several other shipments, the counterfeit fentanyl pills seized from Parcel 3 were hidden inside children's toys, as pictured below:

***Parcel 3 Surv Images and Seized Narcotics***



3. In January 2023, JONES shipped a package with 118 grams of fentanyl pills to a recipient in Maryland who MILLER had previously discussed shipping drugs to.

51. On January 5, 2023, JONES<sup>11</sup> mailed a parcel (Parcel 6) containing drugs from a post office in Sacramento to "Mickey Berry" at an address in Baltimore, Maryland.

52. Just a few months earlier, MILLER had exchanged messages with Berry discussing

<sup>11</sup> I conducted a review of the Sacramento Post Office surveillance videos present during the time PARCEL 6 was mailed, and based on a review and comparison of DMV, Social Media, and Jail Booking images, the person that mailed PARCEL 6 containing the fentanyl was JONES.

1 shipping pills to Gwynn Oak, Maryland, a suburb of Baltimore.

2 53. Specifically, in November 2022, MILLER had a conversation—obtained through his  
3 iCloud account—with the user of phone number 916-596-5729. This phone number is believed to be  
4 used by Mykaela Berry based on a search of CLEAR and the fact that MILLER identified the user of this  
5 phone number as “Mickey.” Berry was also the intended recipient of Parcel 6, and the messages between  
6 MILLER and Berry show the two discussed shipping “blues” to Maryland.

7 a) First, on November 9, 2022, Berry sent MILLER a message asking, “How much your  
8 blues go for?” I interpret this message to be Berry asking MILLER how much he is currently  
9 selling his “blues” for, which I understand to be a term used to refer to counterfeit oxycodone  
10 pills containing fentanyl, which are often blue.

11 b) About a week later, on November 18, 2022, Berry and MILLER continued to discuss  
12 shipping an item to Maryland:

13 Berry: I wanted to check the soonest you could throw it so maybe  
14 it'll Be waiting for me when I get there Sunday if it left  
today

15 MILLER: nah i could send it out tommorrow..u gotta pay first tho..but  
16 it's guaranteed

17 Berry: Okay that's no problem. Do you use usps?

18 MILLER: i'll call u ina min

19 Berry: Okay cool

20 Berry: Mickey B. 1527 Clairidge Rd Gwynn Oak, Md 21207

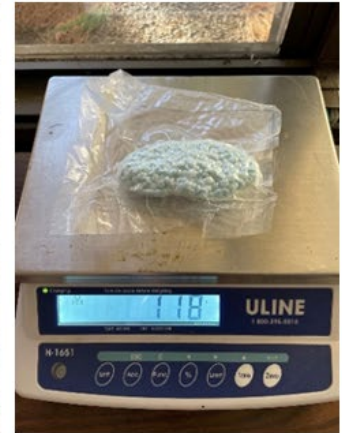
21 c) I interpret this conversation to be Berry asking MILLER how soon he could mail a  
22 package to her (“the soonest you could throw it”), in further reference to her request for “blue”  
23 oxycodone pills. MILLER responded that he could send the package “tomorrow,” but that Berry  
24 would have to “pay first.” Berry then provided the shipping name and address to be used on the  
25 parcel of drugs MILLER would ship to her.

26 d) The same day—November 18, 2022—shipping records show that an Express parcel was  
27 mailed from West Sacramento to the address Berry provided: 1527 Clairidge Rd, Gwynn Oak,  
28 Maryland 21207. The package was delivered the following day.



54. A month and a half later, on January 5, 2023, when JONES mailed the parcel (Parcel 6) to “Mickey Berry” in Baltimore, agents seized Parcel 6 and searched it pursuant to a federal search warrant (2:23-SW-0057-KJN). I seized approximately 118 grams of counterfeit blue oxycodone pills which field tested positive for fentanyl:

***Parcel 6 Surv Image and Narcotics***



4. In January 2023, text messages between MILLER and CAMPBELL indicate that CAMPBELL mailed a package to an address in Baltimore on behalf of the MILLER-JONES DTO.

55. Text messages between MILLER and CAMPBELL<sup>12</sup>— obtained from MILLER’s iCloud—indicate that on January 26, 2023, MILLER directed CAMPBELL to drop a package at the post office:

MILLER: ok i’m almost there ..drop it at the post office before u go please

CAMPBELL: Ok

MILLER: i’ll follow u there n grab the receipt from u

CAMPBELL: That’s what I was going to do

MILLER: outside

CAMPBELL: Coming

56. I interpret to this message to mean that CAMPBELL was mailing a parcel containing

<sup>12</sup> Law enforcement identified this phone number belonging to Jazzmine CAMPBELL through a search of CLEAR and through MILLER’s iCloud accounts, which had the phone number saved under the contact name “Jazzmine.”



1 drugs at MILLER's direction. This is significant because it demonstrates that CAMPBELL is familiar  
2 with the ongoing drug operation and communicates directly with MILLER about pending drug shipments  
3 made on behalf of the MILLER-JONES DTO.

4 57. At the time the parcel was mailed, the GPS location information for MILLER's cell phone  
5 showed that it was in the vicinity of the same post office.

6 58. I am also aware based on a review of USPS records and surveillance video, on January 26,  
7 2023, CAMPBELL mailed a parcel containing suspected drugs from a Sacramento post office to an  
8 address in Baltimore, Maryland. As discussed above, the MILLER-JONES DTO has previously shipped  
9 drugs to addresses in the Baltimore area. Thus, I believe that the parcel sent by CAMPBELL from  
10 Sacramento to Baltimore on January 26, 2023, contained drugs and was sent to a downstream distributor  
11 for the MILLER-JONES DTO located in Baltimore.

12 5. In February 2023, CAMPBELL shipped two packages containing approximately  
13 2.5 pounds of counterfeit Adderall and Xanax pills to Anchorage, Alaska.

14 59. On February 7, 2023, CAMPBELL shipped two parcels (Parcels 8 and 9) containing drugs  
15 from a post office in Sacramento to an address in Anchorage, Alaska.<sup>13</sup> I believe each of these packages  
16 were sent as part of her ongoing role in assisting the distribution of drugs by the MILLER-JONES DTO.

17 60. Postal Inspectors in Alaska searched the parcels pursuant to federal search warrants issued  
18 in the District of Alaska (3:23-MJ-00101-KFR and 3:23-MJ-00102-KFR). In total, the parcels contained  
19 approximately one pound of counterfeit Adderall pills and one and a half pounds of counterfeit Xanax  
20 pills. The counterfeit Adderall pills field-tested positive for the presence of Methamphetamine/MDMA.  
21 Field tests on the counterfeit Xanax pills yielded inconclusive results. Below is a photo of the parcels:

22 ///

23 ///

24 ///

25  
26  
27 <sup>13</sup> I conducted a review of the Sacramento Post Office surveillance video present during the time  
28 PARCELS 8 and 9 were mailed and based on knowledge of the investigation and a review of DMV and  
Social Media images, the person that mailed PARCELS 8 and 9 containing the counterfeit pills was  
CAMPBELL.

**Parcel 8 and 9 Surv Image and Seized Narcotics**

61. Additionally, on January 31, 2023, a week before a trip to Alaska, MILLER had a conversation with an unknown individual on Instagram where MILLER stated that he had “pressed orange addys” and “b707 and white zanz.” These coded references are consistent with MILLER representing that he possessed drugs that match the drugs that CAMPBELL shipped: orange counterfeit Adderall pills (“orange addys”), blue counterfeit Xanax pills stamped with the letters “b707” (“b707”), and white counterfeit Xanax pills (“white zanz”). Given that MILLER’s coded offer to supply three very specific types of illegal pills over Instagram matches the same very specific types of illegal pills sent by CAMPBELL, I believe MILLER coordinated with CAMPBELL to arrange shipments of the drugs to a downstream distributor of the MILLER-JONES DTO located in Alaska.

6. In March 2023, SHAW mailed a package from Sacramento to Sioux Falls, South Dakota, containing one pound of fentanyl pills. The following day, a parcel was mailed from Sioux Falls to JONES’s address in Sacramento containing \$11,000 in cashier’s checks.

62. On March 21, 2023, Felicia SHAW<sup>14</sup> mailed a parcel from a Sacramento area post office to “Singleton Wright 812 W Bailey St #9 Sioux Falls, SD 57104” (Parcel 11). I searched this parcel pursuant to a federal search warrant (2:23-sw-0303 KJN) and recovered approximately one pound of suspected fentanyl pills. I conducted field tests of the suspected fentanyl pills, which field tested positive for fentanyl. Below is a photo of SHAW mailing the drugs:

<sup>14</sup> I conducted a review of the post office surveillance video present during the time the parcel (Parcel 11) was mailed, and based on the knowledge of the ongoing investigation and a review and comparison of DMV and Social Media images, the person that mailed the parcel was SHAW.

**Parcel 11 Surv Image and Seized Narcotics**

63. The following day, March 22, 2023, a parcel (Parcel 10) was mailed from a post office located in Sioux Falls, South Dakota, destined to: “Reginald Jones 1808 N st #12 Sacramento, Ca 95811”. I searched this parcel pursuant to a federal search warrant (2:23-sw-0291 DB) and observed two cashier’s checks which totaled \$11,000. Both cashier’s checks, dated March 22, 2023, were purchased from two separate Sioux Falls, South Dakota Chase Banks, and identified the payee as JONES. During a subsequent controlled delivery operation on March 24, 2023, JONES took custody of Parcel 10 containing the cashier’s checks at 1808 N St, #12, Sacramento, CA 95811.

64. About a week later, on March 30, another parcel (Parcel 12) was mailed to a post office located in Sioux Falls, South Dakota, destined again to: “Reginald Jones 1808 N St Apt #12 Sacramento, Ca 95811.” The parcel had a return address of “514 S. Lake Ave Sioux Falls SD 57104,” an address law enforcement previously identified as receiving suspected narcotics shipments from the MILLER-JONES DTO. I searched this parcel pursuant to a federal search warrant (2:23-sw-0334 KJN) and found a cashier’s check inside Parcel 12, in the amount of \$2,650, with a payee of “REGINALD JONES.”

65. Based on a check of USPS business and shipping records, JONES has received other parcels that appear to be consistent with parcels containing payments for drugs, similar to Parcels 11 and 12, from multiple states the MILLER-JONES DTO ship drugs to.

a) Specifically, on at least nine different occasions from April 2022 to January 2023, JONES received parcels from addresses in Tennessee, Montana, Pennsylvania, and Michigan. Based on postal and travel records, these are all states where the MILLER-JONES DTO has shipped packages of suspected drugs.

66. Also, based on USPS business records, post office surveillance videos, and SHAW'S cell phone GPS data, SHAW has mailed additional packages of suspected drugs for the MILLER-JONES DTO to at least five different States: South Dakota, Montana, Louisiana, Michigan, and New Jersey.

7. In April 2023, SHAW mailed another package from Sacramento to Sioux Falls, South Dakota.

67. On April 17, 2023, while monitoring the GPS location of SHAW'S cell phone, I observed it was located in the vicinity of the Davis Post Office, the same post office utilized by the MILLER-JONES DTO to ship other parcels. A short time later, I arrived at the Davis Post Office and observed that a Priority Mail parcel, similar to others in this investigation, was mailed to an address in Sioux Falls, South Dakota.

68. A review of the post office surveillance video present at the time the parcel was mailed showed SHAW mailing the parcel. After photographing the exterior of the parcel, it was allowed to continue in the mail stream and was not seized. A later check of USPS business records revealed that on the same date, another parcel was mailed from a different post office in the greater Sacramento area destined to the same Sioux Falls, South Dakota address.

8. In May 2023, SHAW mailed a package containing fentanyl pills from Sacramento to Mississippi.

69. On May 19, 2023, Felicia SHAW<sup>15</sup> mailed a parcel from a Sacramento area post office to "T. Garner 102 Champagne St Greenwood, MS 38930" (Parcel 13). I searched this parcel pursuant to a federal search warrant (2:23-sw-0507 JDP) and recovered approximately 61 grams of suspected fentanyl pills. I conducted field tests of the suspected fentanyl pills, which field tested positive for fentanyl.

**E. MILLER, JONES, SHAW, VAN II, and CAMPBELL have all taken short trips to locations they have also mailed drugs to, consistent with collecting money for drug sales.**

70. On several occasions, flight records and phone GPS location data show that the members

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<sup>15</sup> I conducted a review of the Sacramento Post Office surveillance video present during the time PARCEL 13 was mailed, and based on knowledge of the investigation, physical surveillance and a review of DMV and Social Media images, the person that mailed PARCEL 13 containing the counterfeit pills was Felicia SHAW. Additionally, I conducted a review of the data from the court authorized GPS tracker on SHAW'S vehicle, as well as the GPS location information on SHAW'S cell phone, and observed at the time PARCEL 13 was mailed, both the vehicle and her cell phone were located in the vicinity of the same Sacramento Post Office.

of the MILLER-JONES DTO have taken flights to locations where they have mailed drugs, then returned to Sacramento in less than 48 hours.

71. I am aware based on my training and experience that persons who traffic and distribute drugs throughout the United States will often fly to the destination where the drug customers reside, in order to collect payment in person or to meet their drug shipment to ensure its safe delivery to the customer. I am also aware these trips are typically of short duration, unlike travel for leisure.

72. Several flights taken by members of the MILLER-JONES DTO have occurred shortly after shipments to the same location, which is also consistent with travel to pick up money for drug sales.

1. On February 7, 2023, MILLER and JONES flew from Sacramento to Anchorage, Alaska, on the same day CAMPBELL shipped a package containing approximately 2.5 pounds of counterfeit Adderall and Xanax pills to Anchorage.

73. For example, on February 7, 2023, GPS location data for the phones of MILLER and JONES showed that both MILLER and JONES flew from Sacramento to Anchorage, Alaska, on separate flights. Specifically, MILLER left Sacramento in the morning, while JONES left Sacramento midday and arrived in Anchorage late in the evening. Once JONES arrived in Anchorage, GPS location data showed that he and MILLER's phones were both located in the vicinity of the same hotel.

74. Later that same day (February 7, 2023), CAMPBELL shipped two parcels (Parcels 8 and 9) containing 2.5 pounds of counterfeit drugs from a post office in Sacramento to an address in Anchorage, Alaska, as discussed above.

75. GPS data shows that MILLER and JONES both returned from Anchorage to Sacramento early the following day, February 8, meaning they flew approximately 3,000 miles to stay in Anchorage for less than 24 hours. I know from my training and experience that long trips with a quick return is often consistent with business travel or drug trafficking, and not personal travel. I believe the pattern of travel of MILLER and JONES, which overlaps with the contemporaneous shipment of drugs by CAMPBELL to the same location, demonstrates that MILLER, JONES, and CAMPBELL worked in coordination to have drugs shipped from Sacramento to Alaska, with MILLER and JONES responsible for flying to Alaska to collect drug money from distributors in Alaska, then flying back to Sacramento to bring the money back.

///



2. On April 15, 2023, MILLER flew from Sacramento to Sioux Falls, South Dakota, and returned the next day.

76. On April 15, 2023, a review of flight records and GPS location data for MILLER's cell phone indicate MILLER flew to Sioux Falls, South Dakota, arriving at approximately 1 p.m. He left Sioux Falls the next morning at 6:30 a.m. and flew back to Sacramento.

77. As discussed above, the MILLER-JONES DTO has shipped multiple parcels to Sioux Falls containing fentanyl pills. In addition, MILLER's trip on April 15 was only two days after SHAW sent a parcel to Sioux Falls, as discussed above.

78. Like the established pattern used by the MILLER-JONES DTO in connection with sending drugs to Alaska, I believe this travel pattern, coupled with contemporaneous shipment of a drug parcel by SHAW, is consistent with MILLER traveling to Sioux Falls to oversee the distribution of drugs shipped by SHAW and collection of drug money with a quick return to Sacramento.

3. Several members of the MILLER-JONES DTO have taken short trips to locations where the DTO has shipped narcotics.

79. Based on a review of flight records, law enforcement has also observed that members of the MILLER-JONES DTO regularly take short duration flights to the same destination cities around the United States where they ship narcotics to. During these trips, MILLER, JONES, SHAW, VAN II and CAMPBELL will often stay less than 48 hours at the destination before flying back to Sacramento.

80. Beginning in 2022, based on reviews of flight records, cell phone data, bank records, and text messages, law enforcement observed many trips for less than 48 hours—and frequently for less than 24 hours—by members of the MILLER-JONES DTO. On some occasions, members of the MILLER-JONES DTO traveled together on the same flight, or on separate flights to the same destination on the same date. An example of each member's short-duration flights is below:

- a) MILLER has taken multiple flights to Arizona, Alaska, South Dakota, Mississippi and North Carolina;
- b) JONES has taken multiple trips to Arizona, Alaska, South Dakota and Pennsylvania;
- c) SHAW has taken flights to Arizona;
- d) VAN has taken flights to Arizona and Alaska;



- e) CAMPBELL has taken multiple flights to Alaska, Mississippi and North Carolina; and
- f) MILLER and CAMPBELL have flown together on multiple occasions to Alaska, Mississippi and North Carolina.

81. The verified flight movements of each participant in the MILLER-JONES DTO to states with confirmed drug trafficking shipments from this organization is consistent with each member of the conspiracy playing specific, critical roles that sometimes are alternated among the conspirators. For example, in some instances, shipments by SHAW or CAMPBELL correspond with trips by MILLER or JONES. In other instances, I believe SHAW and CAMPBELL are used to travel to various states to collect drug shipments and/or collect drug money owed to the MILLER-JONES DTO. In addition, participants like VAN II assist the MILLER-JONES DTO by coordinating shipments directly with MILLER over texts, as he did during the conversations from July 6, 2022.

**F. MILLER-JONES DTO members have a large number of suspicious financial transactions and money movement consistent with ongoing involvement in drug trafficking.**

82. In May 2023, law enforcement began conducting reviews of the financial accounts of MILLER and JONES. During the initial reviews, law enforcement observed that MILLER and JONES have a significant number of cash transactions and large amounts of money being transferred between their accounts using Bank of America, Zelle, Apple Cash and CashApp services.

83. For example, beginning in 2021, MILLER's Bank of America account ending in -9613 had over \$180,000 in ATM deposits, over \$60,000 in cash withdraws, over \$20,000 in transfers to his CashApp account, and transferred over \$4,500 from Bank of America account -9613 to JONES' Bank of America account ending in -3506. Law enforcement also observed MILLER's CashApp account transferred over \$3,000 to CAMPBELL's CashApp account.

84. When reviewing JONES's Bank of America account ending in -3506, law enforcement observed he had over \$180,000 in ATM deposits, over \$80,000 in cash withdraws, and sent over \$15,000 to MILLER's Bank of America account. JONES also received over \$40,000 in transfers from SHAW's Zelle account.

85. I am aware based on my training and experience that persons who traffic drugs throughout the United States will often have multiple bank accounts, large amounts of ATM and cash transactions,

1 and will move money to and from multiple accounts in an attempt to avoid bank reporting requirements  
2 and to avoid detection from law enforcement.

3 **IV. CONCLUSION**

4 86. Based on the foregoing, there is probable cause to believe that Marcus MILLER, Reginald  
5 JONES, Felicia SHAW, Jimmy VAN II, and Jazzmine CAMPBELL did knowingly and intentionally  
6 conspire to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C.  
7 §§ 846 and 841(a)(1). I respectfully request that a criminal complaint be issued against the defendants  
8 for the crimes detailed above, and based upon this criminal complaint, arrest warrants be issued for each  
9 of these defendants.

10 **V. SEALING REQUEST**

11 87. This Affidavit describes the investigation of the activities of the MILLER-JONES DTO.  
12 The targets named in this complaint are out of custody. The United States believes that public disclosure  
13 of either the criminal complaint or this Affidavit will cause the targets to flee or to take other actions to  
14 conceal their locations prior to their arrest. They might also obstruct justice by instructing others to  
15 destroy evidence or to lie to law enforcement officers.

16 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
17 knowledge.

18  
19 Respectfully submitted,

20 /s/ Jason Bauwens

21 

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Jason Bauwens  
22 Postal Inspector  
23 U.S. Postal Inspection Service

24 ///

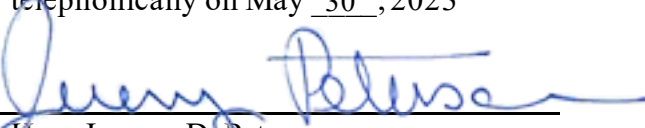
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1 Subscribed and sworn to before me  
2 telephonically on May 30, 2023

3 

4 Hon. Jeremy D. Peterson  
U.S. MAGISTRATE JUDGE

5  
6 

7  
8 Approved as to form by AUSAS ALEXS KLEIN  
and ROSS PEARSON

**United States v. Marcus Miller et al.**  
**Penalties for Criminal Complaint**

**DEFENDANTS**

**Marcus MILLER**  
**Reginald JONES**  
**Felicia SHAW**  
**Jimmy VAN II**  
**Jazzmine CAMPBELL**

**COUNT ONE:**      **ALL DEFENDANTS**

**VIOLATION:**      21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Distribute and Possess with Intent to Distribute at least 400 grams of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, popularly known as “fentanyl,” a Schedule II controlled substance;

**PENALTIES:**      Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or  
Fine of up to \$10,000,000; or both fine and imprisonment  
Supervised release of at least 5 years up to life

**SPECIAL ASSESSMENT:** \$100 (mandatory on each count)

**FORFEITURE ALLEGATION:**      **ALL DEFENDANTS**

**VIOLATION:**      21 U.S.C. § 853(a) - Criminal Forfeiture

**PENALTIES:**      As stated in the charging document